

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

CRYSTAL WILLIAMS,)
TENESHA DOUGLAS and)
SHAMINA GREEN,)
Individually and on behalf of others)
similarly situated,)
)
Plaintiffs,)
)
v.) CIVIL ACTION FILE
) NO. 1:14-cv-0700-SCJ
MPC, INC. d/b/a STROKERS)
and TERRI B. FISCHER,)
)
Defendants.) JURY TRIAL DEMANDED

**NOTICE OF DEPOSITION OF MPC, INC. PURSUANT TO FED. R. CIV.
PRO. § 30(B)(6)**

TO: MPC, Inc.
c/o Bennet Alsher, Esq.
FordHarrison LLP
271 17th Street NW, Suite 1900
Atlanta, GA 30363
Office: 404-888-3852

Pursuant to Fed R. Civ. Pro. § 30(b)(6), please take notice that Plaintiffs, by
an through their undersigned attorney, will take the deposition by oral examination
of an Officer(s), agent or designated representative(s) of MPC, Inc. as to the
matters set forth in Attachment A hereto at FordHarrison LLP, 271 17th Street NW,
Suite 1900, Atlanta, Georgia 30363 at 9:30am on November 13, 2014. This

deposition is taken for all purposes allowed under the Fed R. Civ. Pro.

Respectfully submitted this 27th day of October, 2014.

s/Paul J. Sharman

Paul J. Sharman 227207
THE SHARMAN LAW FIRM, LLC
Attorney for Plaintiffs
11175 Cicero Dr., Suite 100
Alpharetta, Georgia 30022
(678) 242-5297
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ATTACHMENT A

Please take notice that the deposition of MPC, Inc. shall be taken pursuant to Fed R. Civ. P. 30(b)(6). Please be advised that, pursuant to Fed R. Civ. P. 30(b)(6) you have the duty to designate one or more officers, directors, managing agents or other persons who consent to testify on your behalf as to matters known or reasonably available to your organization.

To the extent that MPC, Inc. will take the position that these topics are not stated with reasonable particularity, please notify undersigned counsel as soon as possible for clarification.

The matters for examination at this deposition are as follows:

1. Efforts made by MPC, Inc., to designate and prepare one or more persons to testify on MPC, Inc.'s behalf as to matters known or reasonably available to your organization including identification of documents reviewed in preparation for his or her testimony;
2. The qualifications and work experience of the designated person or persons testifying on behalf of MPC, Inc.;
3. The business activities of MPC, Inc.;
4. The ownership structure of MPC, Inc.;
5. The relationship, terms, conditions and status of Plaintiffs' work performed for Defendant;
6. The job description for the positions held by Plaintiffs;
7. The job duties Plaintiffs performed including the time spent by Plaintiffs performing each duty;

8. All work rules applicable to the work schedules and hours of service of Plaintiffs' position including, but not limited to employee wages, pay-periods and overtime, during the relevant periods named in the Complaint;
9. How Plaintiffs' schedules were set (or not set);
10. The collection and existence of Defendant's records of hours worked by Plaintiffs during the relevant time period including, but not limited to those records required by the FLSA in 29 U.S.C. § 211(c);
11. The hours worked by the Plaintiffs during each workweek of the relevant time period;
12. The method by which Plaintiffs were designated as independent contractors including the information and sources considered to make such a designation;
13. The amount and type of costs (if any) levied against Plaintiffs and paid by Plaintiffs to Defendant, its employees, or independent contractors during each shift;
14. The identity of all business entities related or affiliated with Defendant.

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CERTIFICATE OF SERVICE

I hereby certify that on October 17, 2014, a true copy of PLAINTIFFS' NOTICE OF DEPOSITION OF MPC, INC. PURSUANT TO FED. R. CIV. PRO. § 30(B)(6) was filed using the CM/ECF system, which will automatically send notification to all counsel of record.

/s/ Paul J. Sharman
PAUL J. SHARMAN
Georgia State Bar No. 227207
The Sharman Law Firm LLC

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